



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WATER RESOURCES

P.O. BOX CN 029

TRENTON, NEW JERSEY 08625

JOHN W. GASTON JR., P.E.
DIRECTOR

IN THE MATTER OF
CITY OF CAMDEN
CAMDEN CITY WATER DEPARTMENT

* ADMINISTRATIVE *
* ORDER *

The following FINDINGS are made and ORDER issued pursuant to the authority vested in the Commissioner of the New Jersey Department of Environmental Protection (NJDEP) by N.J.S.A. 13:1D-1 et seq. and the New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 et seq., and duly delegated to the Assistant Director of Enforcement of the Division of Water Resources pursuant to N.J.S.A. 13:1B-4e and N.J.S.A. 58:12A-9g.

FINDINGS

1. The City of Camden, through the Camden City Water Department, (hereinafter "the City") owns, operates, and maintains a potable water supply and distribution system (hereinafter "the system") which serves residential and commercial users within the City. The wells supplying the system are situated in five locations within the City and two locations in neighboring Pennsauken Township. The total safe pumping capacity of the well network is approximately 31.8 million gallons per day (mgd).
2. On August 18, 1971, NJDEP issued an Administrative Order (hereinafter "1971 Order") to the City because of the many sub-standard conditions which existed within the system at that time. The 1971 Order required the City to make extensive improvements in the operation and maintenance of the system, to seal abandoned wells, to provide treatment and disinfection where lacking, to maintain operating records, and to provide additional elevated storage capacity. The City complied with most of the requirements of the 1971 Order. However, several of the deficiencies which were addressed in that Order remain uncorrected to date. The outstanding requirements of the 1971 Order are;

a. Provide effective chlorination facilities for City Well No. 11.

b. Improve operation of all water treatment facilities to attain delivered water with non-corrosive characteristics and with a total iron concentration of 0.3 mg/l or less.

c. Provide additional elevated storage capacity, or a combination of additional elevated storage capacity and auxiliary power to operate pumping equipment at the storage facility.

3. On March 25, April 2, and May 14, 1980, NJDEP conducted inspections of the City's potable water system. Besides the aforementioned deficiencies, additional major problems were noted during these inspections. The inspections revealed that several wells were pumping raw untreated ground water directly into the City's distribution system. Various wells in the system were found to produce water which violates maximum contaminant levels set forth in the New Jersey Safe Drinking Water Act Regulations for one or more of the following parameters: chromium, iron, manganese, color, and corrosivity. NJDEP also determined that the City required additional finished water storage capacity, as stated in the 1971 Order, and additional prime sources of water supply.

4. Since July of 1981, NJDEP has endeavored to enter with the City into an Administrative Consent Order. The objective of this proposed Consent Order was to bring the system into compliance with the requirements of the New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 *et seq.*, over a mutually agreeable period of time. The City has repeatedly stated its preference to correct the outstanding system deficiencies on its own schedule and has therefore declined to enter into the proposed Consent Order.

5. In June 1981, an engineering report entitled "Report on Exploratory Leak Detection Study" was completed by Malcolm Pirnie, Inc., consulting engineers for the City. In September 1981, a more comprehensive engineering report entitled "Water System Improvements" was completed by Malcolm Pirnie, Inc. These reports contain in-depth analyses of the existing facilities in the City's system, and recommend specific short and long term capital improvements necessary to insure an adequate and safe water supply to the City. The Malcolm Pirnie reports served as the basis for extensive discussions between NJDEP and the City, and were useful for the purpose of refining the proposed Consent Order and this Administrative Order.

6. The purity and quantity of water as furnished by the City is presently endangered by numerous system deficiencies in the derivation, treatment, storage, and distribution of the water. The City does not have adequate treatment facilities, and has inadequate and insufficient treated water storage capacity. These conditions constitute violations of the New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 et seq., the Safe Drinking Water Act Regulations N.J.A.C. 7:10-1 et seq.. Abandoned wells left unsealed pose a threat of further contamination to the aquifer serving as the City's prime source of water, and constitute violations of N.J.S.A. 58:4A-4 et seq.

ORDER

NOW, THEREFORE, IT IS ORDERED THAT THE CITY OF CAMDEN shall:

7. Within twelve (12) months from the effective date of this Order, seal wells 3, 5, 12 and 15 pursuant to N.J.S.A. 58:4A-4.2 and in accordance with the provisions of N.J.A.C. 7:9-9.1 et seq.. Also within twelve (12) months from the effective date of this Order wells 1, 4, 6, 10, and 16 shall be modified as follows:

- a. Disconnected from the system.
- b. Made functional for ground water monitoring purposes.
- c. Adequately protected from unauthorized access and vandalism..

The City shall provide NJDEP with at least one week prior notification of the intended date for performing each of the actions required above.

8. Immediately cease the discharge of water from City Well No. 11 into the City's distribution system. Until such time as the finished water from City Well No. 11 is brought into compliance with the New Jersey Safe Drinking Water Act, N.J.S.A. 58:12A-1 et seq., Well No. 11 may be used in emergency situations only and chlorination must then be provided. Notification must subsequently be given to NJDEP within ten (10) days as to the nature of the emergency, the length of time the well was in use, and the total gallonage pumped into the system from the well.

9. Develop and submit to NJDEP within twenty-four (24) months from the effective date of this Order a comprehensive operation and maintenance manual which will cover all treatment facilities, pumping stations, and distribution mains within the system.
10. Provide an additional effective above-ground finished water storage capacity of five (5) million gallons within forty-eight (48) months from the effective date of this Order.
11. Undertake a two-phase program of leak correction as discussed in the "Report on Exploratory Leak Detection Study" prepared by Malcolm Pirnie, Inc. dated June 1981. Phase I of this program shall correct the major system leaks and shall be completed by the City within thirty-six (36) months of the effective date of this Order. Phase II of the leak correction program will address all remaining identifiable leakage in the system, and shall be completed within sixty (60) months of the effective date of this Order. The City shall submit to NJDEP semi-annual status reports on the progress of the leak correction program until it has been completed. The first such report shall be due by June 1, 1984. Upon completion of both phases of this leak correction program, the City shall commence a program of routine system leak detection and correction. This routine program must be detailed in the operation and maintenance manual described in paragraph 9 of this Order.
12. Investigate and thoroughly evaluate all interconnections which exist between the system and neighboring public community water supplies. A detailed report on the findings of this effort shall be submitted to NJDEP within six (6) months from the effective date of this Order.
13. All submittals required by this Order shall be made to:
- James K. Hamilton, Chief
Southern Region
Enforcement Element
Division of Water Resources
CN-029
Trenton, New Jersey 08625
14. Nothing in this Order shall constitute a waiver of any statutory or other right of NJDEP pertaining to the provision of an adequate potable water supply to the City of Camden should NJDEP determine that further remedial measures are necessary to protect the public health, safety and/or welfare.

Upon completion of the feasibility study currently in progress for the State's Water Supply Master Plan, this Order shall be amended and expanded as required to resolve the remaining outstanding deficiencies in accordance with the Water Supply Master Plan.

15. NOTICE IS HEREBY GIVEN that pursuant to N.J.S.A. 52:14B-1 et seq., the Camden City Water Department is entitled to a hearing before NJDEP. Any hearing request shall be delivered to the address listed in paragraph thirteen (13) within twenty (20) days from receipt of this Order. Said hearing request shall not stay the terms or effects of this Order.

16. NOTICE IS FURTHER GIVEN that pursuant to N.J.S.A. 52:14B-9(b) (4) and N.J.A.C. 1:1-6.1(b), the applicant in its application for a hearing shall furnish NJDEP with the following:

- a. A statement of the legal authority and jurisdiction under which the hearing or action to be held is requested pursuant to N.J.A.C. 1:1-6.1(b)(1);
- b. A reference to the particular sections of the statutes and rules involved;
- c. A short and plain statement of the matters of fact and law asserted; and
- d. The Order provisions of which the applicant objects, the reasons for such objections, and any alternative provisions proposed by the applicant,

17. NOTICE IS FURTHER GIVEN that if no request for a hearing is received within twenty (20) calendar days, this shall become a final Order.

18. NOTICE IS FURTHER GIVEN that pursuant to N.J.S.A. 58:12A-10, any person who violates this Order shall be subject to civil penalties of up to \$5,000 per day for each day of the violation.

19. The provisions of this Order shall be binding upon the City of Camden, its principals, agents, employees, successors, assigns and tenants.

20. No obligations imposed by this Order are intended to constitute a debt, damage claim, penalty or other civil action which should be limited or discharged in a bankruptcy proceeding. All obligations imposed by this Order shall constitute continuing regulatory obligations imposed pursuant to the police powers of the State of New Jersey, intended to protect the public, health, safety and welfare.

This Order shall be effective upon receipt.

DATE SEP 14 1983

BY AUTHORITY OF
JOHN W. GASTON, JR., P.E.
DIVISION OF WATER RESOURCES

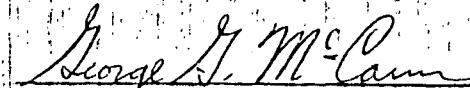
George J. McCann

GEORGE G. McCANN
Assistant Director
Enforcement Element

PRESS RELEASE

George G. McCann, Assistant Director of Enforcement for the Division of Water Resources within the New Jersey Department of Environmental Protection (NJDEP), today announced the issuance of an Administrative Order against the City of Camden. This action was taken by NJDEP to prompt correction of the many sub-standard conditions found within the City's public community water supply.

The Order requires the City to correct system leakage, provide additional elevated water storage capacity, and to seal abandoned or contaminated wells. These measures are necessary to bring the City's water supply into compliance with the New Jersey Safe Drinking Water Act Regulations and to protect the public health.


George G. McCann
Assistant Director
Enforcement Element